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7 DAVID GILBERT SAFFRON

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9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
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13 Plaintiff,
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15 v.
16 DAVID GILBERT SAFFRON,
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18 Defendant.

Case No. 2:22 CR 00276-DSF

**DECLARATION OF TERREE A.
BOWERS IN RESPONSE TO
UNITED STATES OF AMERICA'S
REQUEST FOR JUDICIAL INQUIRY
REGARDING POTENTIAL
CONFLICTS OF INTEREST [DKT.
43]**

HEARING

Date: January 9, 2023

Time: 8:30 a.m.

Courtroom: 7D

Judge: The Hon. Dale S. Fischer

Mag. Judge: The Hon. John D. Early

Action Filed: 7/12/2022

Trial Date: 2/7/2023

DECLARATION OF TERREE A. BOWERS

I, Terree A. Bowers, declare as follows:

1. I am Counsel to ArentFox Schiff LLP, counsel for defendant David Gilbert Saffron (“Defendant”), for a limited purpose identified by the Court and as described more particularly below. I am licensed to practice law in the State of California and before the Court. I make this declaration based upon my own knowledge and if called upon to testify could and would testify competently hereto. I make this declaration in response to the United States of America’s Request for Judicial Inquiry Regarding Potential Conflicts of Interest, and in further support of ArentFox Schiff LLP’s Motion to Withdraw as counsel for Defendant.

2. I participated in ArentFox Schiff LLP’s Motion to Withdraw as counsel for defendant on October 28, 2022. The Court Minutes from the hearing state that ArentFox Schiff LLP “will remain as counsel for the sole purpose of advising [Defendant] whether to waive any potential conflict as to Mr. Axelrod.” [Dkt. 42.]

3. I counseled Defendant on the waiver of conflict, as required by the Court, on November 15, 2022, and at various other times. I also provided Defendant with a proposed written waiver that he could use to inform the United States and the Court of any waiver, if he decided to enter into a waiver, as also required by the Court. *Id.* I also told him to contact me if he had any questions. He did not contact with any questions about the waiver.

4. Since providing Defendant with a draft waiver, I have not heard from him further on the subject.

5. I am in receipt of the United States of America’s Request for Judicial Inquiry Regarding Potential Conflicts of Interest (the “Request for Judicial Inquiry”). [Dkt. 43.] The Request for Judicial Inquiry is noticed for hearing on January 9, 2023. On December 21, 2022, I e-mailed a copy of the Request for Judicial Inquiry to Defendant and informed Defendant that he should plan to be present in court, in person, for the hearing on the Request for Judicial Inquiry, on January 9, 2023, at

1 8:30 am, and that he should be prepared to report on his efforts to find new counsel.

2 6. It is my understanding that, based upon the foregoing, I have fulfilled
3 the remaining obligations the Court imposed on ArentFox Schiff, LLP, by the Minute
4 Order dated October 28, 2022 [Dkt. 42], before granting complete withdrawal. At
5 the hearing on the Request for Judicial Inquiry on January 9, 2023, I intend to renew
6 the request of ArentFox Schiff LLP for complete withdrawal from representation of
7 Defendant and I informed Defendant of that intention when I sent him the email on
8 December 21, 2022, referenced above.

9 I declare under penalty of perjury of the laws of the United States of America
10 that this declaration was executed this 21st day of December, 2022, and that all the
11 foregoing is true and correct.

12 /s/Terree A. Bowers
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